

AUG 27 2003

TSO<sub>3</sub>

**TSO<sub>3</sub> Chemical Indicator  
510(k) Summary - K021161**

**Applicant's Name and Address**

TSO<sub>3</sub> Inc.  
2505, Dalton Avenue  
Sainte-Foy (Québec)  
G1P 3S5

Phone : (418) 651-0003  
Fax : (418) 653-5726  
Email : [info@tso3.com](mailto:info@tso3.com)

**Contact United States Agent**

Charles O. Hancock, RAC  
33 Black Watch Trail  
Fairport, New York 14450

Phone 585-223-1850  
Fax : 585-223-6855  
Email : [chancock@frontiernet.net](mailto:chancock@frontiernet.net)

**Submission Date**

April 5, 2002

**Trade Name**

TSO<sub>3</sub> Chemical Indicator

**Common Name**

Chemical sterilization process indicator

**Classification Name**

Physical/chemical process indicator is classified as Class II under Sterilization Process Indicator in 21 CFR 880.2800 by the General Hospital and Personal Use Devices Panel.

**Legally Marketed Equivalent Device Name(s)**

STERRAD<sup>®</sup> Chemical Indicator

## INDICATIONS-FOR-USE

The TSO<sub>3</sub> Chemical Indicator is a process indicator intended for use by healthcare providers to accompany sterilization packs, containers, or trays intended to be sterilized in the TSO<sub>3</sub>, Model 125L Sterilizer. It is intended to differentiate between unprocessed items and processed items. The color of the TSO<sub>3</sub> Chemical Indicator changes from a red to lighter than the peach reference color when exposed to ozone, a critical component of the TSO<sub>3</sub> Model 125L Sterilizer sterilization process.

### Description of Device

The TSO<sub>3</sub> Chemical Indicator is a process indicator strip intended to be used in the TSO<sub>3</sub>-125L Ozone Sterilizer. The TSO<sub>3</sub>-125L Ozone Sterilizer uses Ozone vapor at low temperature and high humidity to destroy both spore-forming and nonspore-forming microorganisms. The routine use of CI's is considered to complement the employment of a biological indicator monitoring program. The TSO<sub>3</sub> Chemical Indicator can be used to identify that an item has been processed through the TSO<sub>3</sub>-125L Ozone Sterilizer and that the Ozone was present. It does not imply that terminal sterilization occurred or to assure that the sterilization cycle has been completed.

### The Indicator Strip

The TSO<sub>3</sub> Chemical Indicator is comprised of a paper strip upon which a reactant chemical indicator ink is printed which is then overcoated with a clear finish to prevent the indicator ink from being damaged by handling or abrasion before, during or after use. The imprint consists of a red indicating ink circle located within a peach colored reference square. When the color of the indicator circle has changed to a color lighter than that of the surrounding peach colored reference square, the appropriate exposure to Ozone has taken place.

### Packaging

The TSO<sub>3</sub> Chemical Indicator strips are packaged in rolls of 1000 indicators adhesively affixed to the roll to be peeled off for use. The rolls are packaged 2 per box for distribution.

### Performance testing

The TSO<sub>3</sub> Chemical Indicator is intended for one time, single use by health care workers to differentiate processed from unprocessed items.

Performance testing to support a substantial equivalence decision include the following :

Incremental exposures to ozone - For the CI to reach its end point, the ozone dose injected into the sterilization chamber (ozone concentration) must be at least 70 mg/L.



Effects of other chemicals on the TSO<sub>3</sub> Chemical Indicator color pre and post exposure to ozone :

Tests were conducted to determine the effect of acid and basic vapors and solutions on the color stability of the Chemical Indicators. Generally, with the exception of liquids and very strong alkaline vapors, the color stability was not effected.

The effect of UV exposure on color stability of the TSO<sub>3</sub> Chemical Indicator was evaluated for pre and post exposure to ozone. Unprocessed CIs were exposed to UV for 15, 30, 45 and 60 days. The unprocessed CI's color was not affected by UV exposure. The color of the CI is stable to UV up to 2 months after being processed in a partial sterilization cycle. A slight color difference is observed for CIs processed to a partial sterilization cycle when exposed to UV between 3 to 12 months.

The effects of other sterilization processes on the color stability of the TSO<sub>3</sub> Chemical Indicator were evaluated:

CIs were processed to an EtO sterilization cycle and the CI color is not affected by EtO sterilization process.

CIs were also processed to 2 different (liquid and porous load) Steam sterilization cycles. Results indicate that the CI color is effected by a liquid cycle in an autoclave but not affected by a porous load cycle.

Cytotoxicity tests were conducted to determine if residues could be released by the CI when exposed to the sterilization cycle. CI's were processed in contact with polymer (LDPE), Stainless Steel coupons and medical grade silicone inside a sterilization pouch. Results showed that the CI does not induce cytotoxicity.

### **Conclusion**

The results of the performance studies with the TSO<sub>3</sub> Chemical Indicator demonstrated that the TSO<sub>3</sub> Chemical Indicator is appropriate for its intended use.



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Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

Technologies of Sterilization with Oxone, TSO3 Incorporation  
C/O Mr. Charles O. Hancock, RAC  
President  
Charles O. Hancock Associates, Incorporated  
33 Black Watch Trail  
Fairport, New York 14450-3701

Re: K021161  
Trade/Device Name: TOS<sub>3</sub> Chemical Sterilization Process  
Indicator  
Regulation Number: 880.2800 (b)  
Regulation Name: Sterilization Process Indicator  
Regulatory Class: II  
Product Code: JOJ  
Dated: August 18, 2003  
Received: August 20, 2003

Dear Mr. Hancock:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (301) 594-4618. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>

Sincerely yours,

A handwritten signature in black ink that reads "Susan Runner". The signature is fluid and cursive, with the first name "Susan" and the last name "Runner" clearly distinguishable.

Susan Runner, DDS, MA  
Interim Director  
Division of Anesthesiology, General Hospital,  
Infection Control and Dental Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure



**Indication for Use Statement**  
**510(k) Number K021161**

**Device Name :** TSO<sub>3</sub> Chemical Indicator

**Indications for Use :**

The TSO<sub>3</sub> Chemical Indicator is a process indicator intended for use by health care providers to accompany sterilization packs, containers, or trays to be sterilized in the TSO<sub>3</sub> Model 125L Ozone Sterilizer. It is intended to differentiate between unprocessed items and processed items.

The color of the TSO<sub>3</sub> Chemical Indicator changes from a red to lighter than the peach reference color when exposed to ozone, a critical component of the TSO<sub>3</sub> Model 125L Sterilizer sterilization process.

A handwritten signature in black ink, reading 'Chin S. Lim', written over a horizontal line.

(Division Sign-Off)  
Division of Anesthesiology, General Hospital,  
Infection Control, Dental Devices

510(k) Number: K021161